



Robert G. Allen
President/CEO

March 12, 2004

Ms. Jennifer L. Johnson
Secretary
Board of Governors of the Federal Reserve System
20" Street and Constitution Avenue, NW
Washington, DC 20551

Re: Comments to Proposed Amendments To Regulation CC
Docket No.: R-1176

Dear Ms. Johnson,

On behalf of Teachers Federal Credit Union, I would like to thank the Board of Governors of the Federal Reserve System (Federal Reserve) for inviting us to comment on the proposed regulation to amend Regulation CC to implement the Check Clearing for the 21st Century Act (the "Check 21").

We support the proposed amendment overall. Benefits include the savings that will be realized by allowing financial institutions to substitute paper checks with electronic equivalents sooner and more often during the check clearing process. Check 21 will also allow for faster collection and return of checks which will help mitigate check fraud.

Concerns

1. Consumer disclosure (229.57(b)(2)): We prefer alternative 2 which will enable us to give the member the required disclosure information at the time the substitute check is provided rather than when the check is requested.
2. Model language for member disclosure (form C-5A of appendix C): This language should be modified, if possible, to increase clarity.

Once again, Teachers Federal Credit Union would like to thank the Federal Reserve for the opportunity to comment. We would be happy to further discuss this matter, if you so desire.

Sincerely,

Robert G. Allen
President/CEO